

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE
District OF Pennsylvania WILLIAMSPORT

OCT 25 2024

Thomas D. Nicholson,
Plaintiff

PER EA
DEPUTY CLERK

NO. 4:24-CV-1758

V.
Vaarstad, et al
Defendants

Motion FOR THE Appointment OF Counsel

Plaintiff, Thomas D. Nicholson, JR, by and through Peer Educated, Joshua I. Payne who is an Inmate that is helping Plaintiff with writing and reading all of these filings due to Plaintiff's Mental Unstability. Hereby Files this Motion Pursuant to §1915, requests this Court to Appoint Counsel to represent Plaintiff in this case for the following reasons.

1. The Plaintiff is unable to afford Counsel.
2. The Issues Involved in this Case are Complex.
3. The Plaintiff, is an Inmate who is Mentally Incompetent and who needs someone to read and write for him.
4. Also, Plaintiff is housed on an General Population block that is only for inmates that are Mentally Unstable that Can not do for themselves due to their many Mental health Impairments. This unit is called the "RTU".
5. Over 30 days ago, the Plaintiff and I wrote letters to different attorneys, asking them to handle this case but he has not heard from any of them.
6. The Plaintiff has no knowledge of the law, and he must relied on a another inmate who is a Peer educated to help him with or to do his reading and writing of all Pleadings.

Wherefore, this Court should appoint Counsel to represent the Plaintiff.

Dated:

Respectfully Submitted
By: Thomas D. Nicholson
Thomas D. Nicholson #ET4153
SGT-Camp Hill
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Camp Hill, Pa 17001-8837

Written By Joshua I. Payne
Joshua I. Payne #GQ5480

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for the Middle District of Pennsylvania
U.S. Courthouse
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